

EXHIBIT 1

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

JESSE HAMMONS,)	
)	
Plaintiff,)	
)	
v.)	Case No. 20-cv-2088-DKC
)	
UNIVERSITY OF MARYLAND MEDICAL SYSTEM)	
CORPORATION, et al.,)	
)	
Defendants.)	
)	

DECLARATION OF JESSE R. HAMMONS

I, JESSE R. HAMMONS, declare as follows:

1. I make this Declaration in support of my cross-motion for summary judgment and opposition to Defendants' motion for summary judgment.
2. I am the Plaintiff in this action, which I initiated through my Complaint on July 16, 2020.
3. I am a transgender man, which means that I am a man but was designated as female at birth.
4. I have also been diagnosed with gender dysphoria and began receiving gender-affirming testosterone in 2008.
5. Over the course of my treatment for gender dysphoria, medical professionals—such as Dr. Pamela Saint Amand and Dr. Helene Hedian—informed me that it would eventually be medically necessary for me to get a hysterectomy, both to treat my gender dysphoria and because undergoing hormone replacement therapy without the benefit of a hysterectomy could increase the risk of cancer.

6. Consistent with that medical advice, I asked members of a trans support group if they could recommend a surgeon who would perform a hysterectomy to treat my gender dysphoria. Those members referred me to Dr. Steven Adashek.

7. I first met with Dr. Adashek in September 2019. During my appointment with Dr. Adashek, we discussed that due to my gender dysphoria and my risk of cancer, it was medically necessary for me to receive a hysterectomy.

8. Dr. Adashek's office scheduled me to receive a hysterectomy at University of Maryland St. Joseph Medical Center ("St. Joseph") on January 6, 2020. All the scheduling arrangements were made through Dr. Adashek's surgical coordinator, Mary Scheerer.

9. In preparation for my hysterectomy, I underwent pre-operative blood tests, an echocardiogram, and other health screenings.

10. I also worked hard to mentally prepare myself for the procedure, as it was difficult for me to think about a procedure focused on an organ that is typically associated with the sex I was assigned at birth.

11. Finally, I arranged to take time off from work for both the procedure and my recovery. I was employed by The Community College of Baltimore County and asked for the surgery to be scheduled during winter break—when my department at The Community College of Baltimore County would be on break—so I would not have to take additional time off from work for surgery and recovery.

12. On January 5, 2020—the night before my surgery—Dr. Adashek called me and said that my surgery had been cancelled. Dr. Adashek told me that he had been working for several days for the surgery not to be cancelled, but that the hospital had told him that trans care

was not a sufficient enough reason for the hysterectomy to take place at St. Joseph. I recall that Dr. Adashek sounded frustrated about the situation.

13. When I received the phone call from Dr. Adashek, I felt shocked, angry, afraid, and devastated. I felt like I was being told that my health and well-being were not worthy of being protected, and I felt angry that St. Joseph was using other people's religious beliefs to deny me the medical treatment I needed.

14. Due to St. Joseph's cancellation of my surgery, as well as the onset of the COVID-19 pandemic, I was not able to have my hysterectomy rescheduled until June 24, 2020, when it was performed at Greater Baltimore Medical Center.

15. As a result of the rescheduling, I had to spend another six months experiencing gender dysphoria when I had previously anticipated having the therapeutic benefits of having my uterus removed. I also had to spend another six months dealing with the stress and anxiety of having to mentally prepare myself for a major surgery again.

16. I also incurred a monetary cost due to the rescheduling. Specifically, I had to pay for additional pre-operative testing and had to take additional time off work for the rescheduled procedure and the recovery thereafter. I lost \$748.46 in wages as a result of having to take the additional time off work.

* * *

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. I further reserve the right to supplement and/or amend this Declaration.

Date: July 15, 2022



Jesse R. Hammons